P2 Technology ImageUnecker Cf Software Package with Filling Defect Indicator 510(k) Premarket Notification April, 2004

## JUN - 8 2004

## 510(k) Summary of Safety and Effectiveness Prepared April 16, 2004

Submitted by:

R2 Technology, Inc.

1195 W. Fremont Avenue Sunnyvale, CA 94087

**Contact Person:** 

Kathy O'Shaughnessy

Vice President, Regulatory Affairs

**Product Name:** 

ImageChecker CT Software Package with Filling Defect

Indicator

**Common Name:** 

Medical Image Processing Software

**Classification Panel:** 

Radiology

Classification:

Class II (CFR 21 892.2050)

**Product Code:** 

LLZ

#### **Predicate Devices:**

| Product                | Company             | 510(k) Number |
|------------------------|---------------------|---------------|
| LungCARE CT            | Siemens Medical     | K033374       |
| software package with  | Solutions           |               |
| extended functionality |                     |               |
| ImageChecker CT        | R2 Technology, Inc. | K023003       |
| Workstation            |                     |               |

#### **Device Description:**

The ImageChecker CT Software Package with Filling Defect Indicator (FDI), the subject of this notification, is a thoracic image visualization and analysis tool. This tool offers an extended functionality of the ImageChecker CT Workstation, utilizing segmentation techniques similar to the two above-mentioned predicates. Based on physician request, the FDI tool automatically segments locations in the vasculature of the chest containing

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low densities that typically correlate with filling defects. The process is based on simple segmentation methodology applied to contrast-opacified CT images of the chest identifying regions of connected voxels below a certain HU (Hounsfield Unit) threshold. A low density region is highlighted by placing a triangle on the region of the vascular structure of interest. This extended software functionality is designed for use with the existing tool set present on the R2 ImageChecker CT Workstation (K023003) and on other CT workstations that utilize the ImageChecker CT Workstation software tools. The FDI tool contains modifications to the Workstation with a special workflow based on automated segmentation for the visual identification of possible lung filling defects.

## **Summary of Intended Use:**

The ImageChecker CT Software Package with Filling Defect Indicator is intended to be used to enable the radiologist to view and analyze regions of the image containing low density within vascular structures that may be indicative of filling defects or other intravascular abnormalities. This segmentation tool is an extended functionality of the R2 ImageChecker CT Workstation software, and can be used on that self-standing device as well as other imaging workstations that utilize the ImageChecker CT Workstation software. This tool is intended for use as an adjunctive device that assists the radiologist in the review of CT images of the chest.

## **Comparison with Predicate Devices:**

R2 Technology's ImageChecker CT Software Package with Filling Defect Indicator (FDI) software tool, Siemens LungCARE CT software package with extended functionality, and the R2 ImageChecker CT Workstation enable radiologists to view and analyze areas of CT exams. These software packages allow the radiologist to examine segmented candidate regions of interest in the CT volume data sets. The three software packages also enable the radiologist to document and follow up any identified segmented areas of interest.

The Siemens LungCARE CT Software Package with Extended Functionality is a self contained software package containing the specifically developed function of supporting a special workflow based on automated segmentation for the visual identification of possible lesions (Nodule Enhanced Viewing). Likewise, R2's ImageChecker CT Software Package with Filling Defect Indicator is built on the base ImageChecker CT Workstation software with a special workflow based on automated segmentation for the visual identification of possible filling defects of the lung vasculature (FDI).

#### Studies:

The Filling Defect Indicator tools package will undergo design verification tests for conformance with specifications.

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#### **Conclusion:**

The ImageChecker CT Software Package with Filling Defect Indicator has the same intended use as the two predicate devices identified in this section. Any technological differences in the ImageChecker CT Software Package with Filling Defect Indicator and the predicate devices do not raise any new questions regarding safety or effectiveness. Thus, R2 Technology's ImageChecker CT Filling Defect Indicator (FDI) software tool is substantially equivalent to the predicate devices.



Food and Drug Administration 9200 Corporate Boulevard Rockville MD 20850

## JUN - 8 2004

R2 Technologies, Inc. % Ms. Denise Leung Klinker Reviewer, Medical Device Services Underwriters Laboratories, Inc. 1655 Scott Boulevard SANTA CLARA CA 95050-4169 Re: K041380

Trade/Device Name: ImageChecker CT Software Package

with Filling Defect Indicator

Regulation Number: 21 CFR 892.2050 Regulation Name: Picture archiving

and communications system

Regulatory Class: II Product Code: 90 LLZ Dated: May 24, 2004 Received: May 25, 2004

#### Dear Ms. Klinker:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at one of the following numbers, based on the regulation number at the top of the letter:

| 8xx.1xxx                         | (301) 594-4591 |
|----------------------------------|----------------|
| 876.2xxx, 3xxx, 4xxx, 5xxx       | (301) 594-4616 |
| 884.2xxx, 3xxx, 4xxx, 5xxx, 6xxx | (301) 594-4616 |
| 892.2xxx, 3xxx, 4xxx, 5xxx       | (301) 594-4654 |
| Other                            | (301) 594-4692 |

Additionally, for questions on the promotion and advertising of your device, please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97) you may obtain. Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address http://www.fda.gov/cdrh/dsma/dsmamain.html.

Sincerely yours,

Mancy C. Brogdon

Director, Division of Reproductive, Abdominal and Radiological Devices

Office of Device Evaluation

Center for Devices and Radiological Health

Enclosure

# **Indications for Use**

| 510(k) Number                     | K041380   |             |
|-----------------------------------|---|-------------|
|                                   | mageChecker CT Software Package with Filling Defect Ind   | licator     |
| Indications for Use               | e:  |             |
| during the review                 | or CT Software Package with Filling Defect Indicator (FDI) of contrast-enhanced computed tomography (CT) images of lenables the radiologist to view and analyze regions of the ensity within vascular structures that may be indicative of fitular abnormalities. | image       |
| these suspicious ca               | esigned to assist the radiologist in characterization and class<br>candidate thoracic abnormalities in terms of density, size, di<br>n, thus aiding in the patient management care decision proc  | mension,    |
|                                   |   |             |
| Prescription Us<br>(Part 21 CFR 8 | 01 Subpart D) (21 CFR 807 Subpar  | rt C)       |
| (PLEASE DO NO NEEDED)             | T WRITE BELOW THIS LINE-CONTINUE ON ANOTHER   | PAGE IF     |
| Con                               | ncurrence of CDRH, Office of Device Evaluation (ODE   | )           |
| Sec.<br>Divis                     | ision Sign-Off) sion of Reproductive, Abdominal,  | Page 1 of 1 |